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December 14, 2015

By ECF

The Honorable Andrew L. Carter Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

Re: *Gansett One, LLC, et al. v. Husch Blackwell, LLP, et al.*
United States District Court, Southern District of New York
Case No. 15-cv-3551 (ALC) (GWG)
Joint Status Report per November 23, 2015, Order, *Doc. 44*

Dear Judge Carter:

Plaintiffs Gansett One, LLC; SES Wealth Advisors, LLC; GW Holdings, LLC; and Mast and Son, LLC (“Plaintiffs”) and Defendants Husch Blackwell LLP and Diane T. Carter (“Defendants”) jointly write pursuant to the Court’s order dated November 23, 2015, *Doc. 44*, to provide a status report on the parties’ jurisdictional discovery.

Based on information provided by Plaintiffs in response to the Order, Defendants state that they do not, at this time, contend that complete diversity exists among the parties. Defendants take this position without prejudice to asserting complete diversity if, at a future point in time, any information develops that calls into question the information provided by Plaintiffs to date.

Defendants maintain their position regarding supplemental jurisdiction set out in their letter briefs to the Court dated November 10, 2015, and November 20, 2015, *Docs. 41* and *43*. Plaintiffs maintain their position regarding supplemental jurisdiction set out in their letter brief dated November 17, 2015, *Doc. 42*.

Very truly yours,

s/ Christopher P. Montville
Christopher P. Montville
Counsel for Defendants

s/ Elliot D. Ostrove
Elliot D. Ostrove
Counsel for Plaintiffs

cc: All Counsel of Record (by ECF)